



**CLEAN COLD  
POWER**

Clean Cold Power UK Ltd  
Unit 5 Stafford Cross Business Park  
Croydon CR0 4TU  
T: +44 (0) 203 829 0035  
Registered Company No. 12358067

September 10, 2021

California Air Resources Board

1001 I Street

Sacramento, CA 95814

Re: Proposed Amendments to the Airborne Toxic Control Measure for In-Use Diesel-Fueled Transportation Refrigeration Units (TRUs)

Dear ARB Board Members and Staff,

Thank you for the opportunity to provide comments Proposed Amendments to the Airborne Toxic Control Measure for In-Use Diesel-Fueled Transportation Refrigeration Units (TRUs). Cold Clean Power (CCP) fully supports the proposed amendments for zero-emission truck TRUs and looks forward to working with ARB to develop amendments for zero-emission trailer TRUs.

CCP is deploying cost-effective, safe, and easy to install zero-emission TRUs. Our nitrogen-based cooling system provides efficient cooling in the transport of food, medicine, and other goods, which provides a cleaner and more sustainable alternative to conventional diesel refrigeration units. Our TRUs are powered by sustainable nitrogen, from air – without combustion, fuel or the extraordinary pollution generated by conventional diesel-powered refrigeration. Every CCP TRU that replaces a diesel one has the same benefit to clean air as taking 80 cars off the road. In addition, CCP's TRUs are much quieter, reach cold temperatures much faster, and have more precise cooling control than conventional systems.

CCP strongly supports the proposed amendments for zero-emission truck TRUs. CCP is respectfully requests that ARB extend the proposed amendments for zero-emission trailer TRUs as quickly as possible to realize the environmental and other health benefits.

CCP appreciates the opportunity to provide feedback on the Proposed Amendments to the Airborne Toxic Control Measure for In-Use Diesel-Fueled TRUs. We look forward to working with ARB to develop and implement the zero-emission trailer TRU regulation.

Sincerely,